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United States Courts Southern District of Texas FILED

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

MAY 09 2019

David J. Bradley, Clerk of Court

KAMME O	§ §
Plaintiff,	S CIVIL ACTION No. S 4:17-cv-03877
VS.	\$ \$ \$
TEXAS A&M UNIVERSITY, et al.,	§
Defendants.	§ JURY TRIAL DEMAND §
	§ §
	\$

PLAINTIFF'S RESPONSE TO DEFENDANT'S NOTICE OF INTENTION TO TAKE THE ORAL AND VIDEOTAPED DEPOSITION OF THE PLAINTIFF

TO THE HONORABLE JUDGE SIM LAKE and MAGISTRATE JUDGE NANCY K. 19, 2019 JOHNSON: Friday, April Plaintiff Defendant's representation via email (Yvonne.bennett@oag.texas.gov) to suggest a conference. response from the Defendant has been a request for deposition instead.

2019 Plaintiff received the Defendant's NOTICE INTENTION. Upon reading the document what stands out to the Plaintiff is the line that reads, "the deposition will continue day to day until completed".

Plaintiff objects to the unending, open ended deposition. The more Plaintiff considers the INTENTION of this deposition, the more concerned she becomes that it's another potentially hostile experience for her.

Being pro se, the Plaintiff has written what has been submitted to the Court and maintains that what she has submitted is as accurate and honest as she has been able to understand and explain.

Plaintiff endured many witnessed meetings 2014-2016 via the Defendant, from "I notice you've been wearing dresses, you should really wear pants" to "I DARE YOU TO FILE ANOTHER COMPLAINT WITH HR!"

Plaintiff submitted 15+/- written complaints to the Defendant 2015-2016 about how she was being treated at work, following the Texas A&M System Policies. These complaints were either untimely vaguely answered or not answered at all, but they were submitted to the Defendant by the Plaintiff in a timely manner 2015-2016. Plaintiff also contacted TAMU Human Resources by phone and by email expressing that she was afraid to go to the meetings and asked for an unbiased witness, to no avail - the meetings only grew more hostile towards the Plaintiff.

During the EEOC investigation 2015, mediation was denied July 8, 2015 by the Defendant; the work load and atmosphere for the Plaintiff grew increasingly more difficult and confusing.

After all the different witnessed meetings 2015-2016, especially the 11-20-2015 verbal assault by her supervisor

SWATI KALE, the Plaintiff is fearful of the situation and would prefer to never have another meeting with the Defendant-anyone.

For these reasons and more - Plaintiff requests the Court deny the Defendant's request for a never-ending deposition of the Plaintiff.

If a deposition is required, Plaintiff requests it be limited in both time and scope. Even better if, the Defendant accepts the Plaintiff's written words as her statements.

Plaintiff doesn't know how to go about having a conference to discuss settlement if the Defendant continues to refuse to

meet?

Respectfully

Kamme O

aggiecarpentermom@gmail.com 979.575.1091

CERTIFICATE OF SERVICE

I hereby certify that on or before 05-08-2019, Plaintiff emailed a copy of this document to:

YVONNE D. BENNETT

Yvonne.bennett@oag.texas.gov

Assistant Attorney General General Litigation Division P.O. Box 12548, Capitol Station Austin, Texas 78711-2548

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